

# **EXHIBIT 4**

**DECLARATION OF ROBERT DE POTO**

**ROBERT DE POTO**, declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I have been employed by MSG Holdings, L.P. ("MSG") since 1998 and am currently the Senior Coordinating Producer in Media Production for MSG based at 2 Penn Plaza, New York, NY 10121. In that role I selected and supervised student interns engaged to assist the various teams' production crews in the period from 2007-2012.
3. It was my decision to run the internship program and I had discretion over how the program was structured for each intern.
4. My group develops the pre-game, in-game and post-game telecasts for MSG's coverage of each Knicks, Rangers, Liberty, Red Bulls, Devils and Islander's game. I would assign interns to assist the production crew on one of these teams based on which team the intern was most interested in after talking to them.
5. One way I found student intern candidates, I would go directly to Seton Hall, where I had a relationship with the career services department. Aside from this process, I also regularly received informal referrals from colleagues working at other organizations in the industry. I also received numerous intern candidates through family members of other employees and even players. Therefore, Human Resources was not always involved in the selection process for my group.
6. I interviewed each potential student intern and either offered the student an internship or rejected them based on my impression of the student. In selecting candidates, I

would look for students with course study relevant to television production, media or sports and any interest in the specific teams we cover. I would look to see how enthusiastic interns were about particular groups and place interns in a group where I thought they would fit well. Because the television production crews are pretty isolated from the rest of MSG's groups, thoughtful placement of interns was especially important.

7. Most internships were based on the length of the semester at the academic institution providing credit, and these would vary across schools. It was required that every student intern receive academic credit for the internship from their school.

8. Regarding specific hours and days a student intern would show up, there was no set schedule. Most often, interns were expected to be present on days the team had a home game, but were not expected to show up on any other day. That meant some weeks a student intern might be engaged up to 4 days and the next week, no days if there were no home games.

9. As our department's schedule is based off the team's schedule, student intern schedules were constantly changing from semester to semester and year to year. This flexibility allowed interns to devote as much time as necessary to their other academic endeavors. We also were very accommodating towards interns nonacademic responsibilities, including outside work. Additionally, given the flexible schedules, interns could take time off when needed. We only asked student interns to let us know if they would not be coming in, but they did not need to submit any formal documentation the way an employee would.

10. The training interns received varied based on the team they were assigned to as well. I would give student interns a broad overview of the group and the various things we completed and why those activities were important. Then, I would assign each student intern to

be paired with specific producers. At that point, each producer would begin training and mentoring the students directly in a one-on-one fashion.

11. Most of our student interns came in with very little knowledge of the technical systems used in the industry. Therefore, we would spend a great deal of time training student interns on what our group does, such as screening and editing tape and sound clips, as well as having interns regularly shadow full time employees. This training and shadowing was not required for employees, who are expected to already know the technical skills needed for their job.

12. Student interns' activities would differ on a daily basis as well as increasing as a student intern learned more and became more successful. After enough time observing the production teams, interns would complete activities such as screening game videotape to look for highlights, proofreading scripts, assisting with fan interviews and assisting in pre and post-game crew meetings. This allowed interns to gain skills and expertise in production that they did not have when they began. My goal was to make sure interns learned about the behind the scenes aspects of sports production and improved their abilities while absorbing as much of the game production process as possible.

13. Student interns were closely supervised. Even beyond the extensive training we have for all new student interns, we would supervise, review and provide feedback on a regular basis. This process required a real time commitment from our production supervisors. Given all the extra time and attention proper supervision of these interns entailed, the internship program required supervisors to take time out of their routine responsibilities to assist and mentor student interns.

14. Despite the extra work, it was worth it seeing the student interns grow so much in just a short time. Working in sports is naturally exciting and many of our interns were eager to get the unique experience offered by an internship with MSG's television production teams. While I ensured every student intern knew there was no promise of a post-internship position with MSG, I and other production supervisors would write recommendations or serve as a reference for interns to help them obtain jobs in production with other companies. It always made us proud that our student interns were regularly hired by MSG and others in our industry. It also allowed our many student interns majoring in communications a chance to apply their knowledge in the real world and see what the business was like when the cameras were not rolling.

Executed this 26<sup>th</sup> day of March, 2014 in: NEW YORK.

A handwritten signature in dark ink, appearing to read "Robert De Poto", written over a horizontal line.

ROBERT DE POTO